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8 *Co-Lead Counsel for Plaintiffs*

9 [Additional counsel on signature page]

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 BRIAN DONLEY, Individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 LIVE NATION ENTERTAINMENT,
17 INC., MICHAEL RAPINO, and JOE
18 BERCHTOLD,

19 Defendants.
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No. 2:23-cv-06343-KK (ASx)

CLASS ACTION

**JOINT STIPULATION FOR
STAY PENDING
SETTLEMENT**

1 Pursuant to Local Civil Rule 16-15.7, Court-appointed lead plaintiffs Brian
2 Donley and Gene Gress (collectively, “Plaintiffs”) and Defendants Live Nation
3 Entertainment, Inc., Michael Rapino, and Joe Berchtold (collectively,
4 “Defendants”; and together with Plaintiffs, the “Parties”), through their undersigned
5 counsel, hereby notify the Court of their agreement in principle to settle the above-
6 captioned action (“Action”). Accordingly, the Parties hereby stipulate and agree as
7 follows:

8 WHEREAS, the Parties participated in a private mediation with the Hon.
9 Layn Phillips (ret.) on November 13, 2024;

10 WHEREAS, the Parties were unable to reach an agreement during the
11 mediation, but continued their negotiations through Judge Phillips thereafter and
12 have now reached an agreement in principle to fully resolve all claims in this
13 Action;

14 WHEREAS, the Parties require time to negotiate and memorialize the
15 attendant details of the settlement;

16 WHEREAS, Plaintiffs intend to move for preliminary approval of the
17 proposed settlement as soon as practicable after the final settlement agreement is
18 executed;

19 WHEREAS, the Parties wish for their litigation positions to remain
20 undisturbed while they negotiate and finalize their settlement agreement, and to
21 preserve the Court’s and the Parties’ resources;

22 NOW, THEREFORE, the Parties, through their undersigned counsel, hereby
23 agree, stipulate, and respectfully request that the Court enter the accompanying
24 [Proposed] Order, which provides that: “all outstanding deadlines in this Action are
25 hereby stayed pending the Parties’ formal agreement to, and the Court’s approval
26 of, the proposed settlement.”
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Dated: December 13, 2024

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

By: /s/Joshua Baker

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Dated: December 13, 2024

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